

**REMARKS**

In the Office Action, claims 1-22 were rejected. By the present Response, claims 1, 4-7, 11-14, 16-22 are amended to correct clerical errors. Upon entry of the amendments, claims 1-22 will remain pending in the present patent application. Reconsideration and allowance of all pending claims are requested.

**Rejections Under 35 U.S.C. § 103**

Claims 1-22 stand rejected under 35 U.S.C 103(a) as being unpatentable over Pinard et al. (hereinafter Pinard), U.S. 5,940,834 in view of Mills, U.S. Pat. 6,466,940.

Claims 1, 8, 15 and 22 are independent. All of the recited claims are believed to be patentable as cited below.

**Claim 1 and the Claims Depending Therefrom.**

Claim 1 recites, *inter alia*, a method for adding an HTML document to a web site, the HTML document relating to a respective one of a plurality of categories of information. The recited method comprises adding an HTML keyword to the HTML document, wherein the HTML keyword represents one of the plurality of categories of information. The HTML document is uploaded to a directory on the web site. A search is activated in the directory when the respective one of the plurality of categories of information is selected, the search containing at least the HTML keyword. A search engine is called to execute the activated search and produce a search result, the search result containing a link to the HTML document in the directory containing the HTML keyword. An up-to-date web page is then created for the respective one of the plurality of categories of information from the search result. The up-to-date web page includes the link to the HTML documents containing the HTML keyword.

The Examiner relied upon Pinard for teaching adding an HTML keyword to the HTML document wherein the HTML keyword represents the respective one of the plurality of categories of information. Applicants have carefully reviewed the Pinard reference and respectfully submit that the Pinard reference teaches adding or deleting an item class. Further, Pinard teaches assigning an HTML template to be used for a specific instance of that class. However, Applicants respectfully submit that Pinard does not disclose adding an HTML keyword to the HTML document.

Further, the Examiner argued that Pinard teaches creating an up-to-date web page for the respective one of the plurality of categories of information from the search result, wherein the up-to-date web page includes the link to the HTML documents containing the HTML keyword. Applicants have carefully reviewed the Pinard reference and submit that Pinard teaches the automatic web page creation of an organizational directory for use in an Internet and Intranet environment. However, Pinard does not disclose the up-to-date web page including the link to the HTML documents containing the HTML keyword, as claimed. Hence, Applicants respectfully submit that Pinard does not teach creating an up-to-date web page, wherein the up-to-date web page includes the link to the HTML documents containing the HTML keyword.

Also, the Examiner argued that Pinard teaches automatically and dynamically creating a web page or HTML version of an organization directory for use over the Internet by using a web page generator, and that the web page is stored on the web server allowing any user who has network access to the web server offering the web page to view the directory information and the web page or HTML is categorized by item. However, the Examiner acknowledges that Pinard does not explicitly teach uploading the HTML document to a directory on the web site, activating a search in the directory when the respective one of the plurality of categories of information is selected, where the search containing at least the HTML keyword, and calling a search engine to execute the

activated search and produce a search result wherein the search result identifies a link to the HTML document in the directory containing the HTML keyword.

The Examiner relied upon Mills to teach a web page being extracted from web server, from which the web page is parsed into text before displaying on the screen, followed by activating or clicking the button to perform the search based on the search criteria or keyword and calling the search engine as well as activating the search by clicking the button.

However, Applicants have carefully reviewed the both references and respectfully submit that both fail to teach a method wherein a search result identifies a link to the HTML document in the directory containing the HTML keyword. Furthermore, Applicants also submit that neither reference teaches creating an up-to-date web page for the respective one of the plurality of categories of information from the search result, wherein the up-to-date web page includes the link to the HTML documents containing the HTML keyword. Hence, Applicants respectfully submit that Pinard and Mills do not teach, nor does the Examiner argue that the Pinard and Mills references teach a method wherein a search result identifies a link to the HTML document in the directory containing the HTML keyword, and that Pinard and Mills do not teach creating an up-to-date web page for the respective one of the plurality of categories of information from the search result wherein the up-to-date web page includes the link to the HTML documents containing the HTML keyword. Absent such teachings, the Pinard and Mills references cannot support the obviousness rejection.

For at least the reasons summarized hereinabove, Applicants respectfully submit that a *prima facie* case of obviousness has not been established. Accordingly, Applicants respectfully submit that independent claim 1 and claims depending therefrom are clearly patentable over the cited references and respectfully request the Examiner to reconsider rejection of the claims.

**Claim 8 and the Claims Depending Therefrom.**

Claim 8 recites, *inter alia*, a method for adding an HTML document to a web site, the HTML document relating to at least one of a plurality of categories of information.

The Examiner relied upon Pinard for teaching adding an HTML keyword to the HTML document, wherein the HTML keyword represents one of the plurality of categories of information. Furthermore, the Examiner argued that the Pinard reference teaches creating an up-to-date web page for the respective one of the plurality of categories of information from the search result, wherein the up-to-date web page includes each respective link to each of the at least one searchable HTML documents containing the HTML keyword.

In addition, the Examiner relied upon Pinard for teaching automatically and dynamically creating a web page or HTML version of an organization directory for use over the Internet network by using web page generator, where the web page is stored on the web server allowing any user who has network access to the web server offering the web page to view the directory information and creation of web page directory.

The Examiner acknowledges that Pinard does not explicitly teach uploading the HTML document to a respective one of a plurality of directories on the web site, wherein each of the plurality of directories corresponds to a respective one of the plurality of categories of information, where each of the plurality of directories for contains at least one searchable HTML document. The Examiner also admitted that Pinard fails to teach activating a search for the HTML keyword of the at least one searchable HTML document in the respective one of the plurality of directories when the respective one of the plurality of categories of information is selected, the search containing at least the HTML keyword. and the Examiner further admitted that Pinard fails to teach calling a search engine to execute the activated search and produce a search result containing a

respective link to each of the at least one searchable HTML document in the respective one of the plurality of directories containing the HTML keyword.

Furthermore, the Examiner relied upon Mills to teach a web page being extracted from web server from which the web page is parsed into text before displaying on the screen, activating or clicking the button to perform the search based on the search criteria or keyword, and calling the search engine as well as activating the search by clicking the button.

As discussed for claim 1, Applicants respectfully submit that neither Pinard nor Mills teaches nor, does the Examiner argue that the Pinard and Mills references teach a method wherein a search result identifies a link to the HTML document in the directory containing the HTML keyword. Applicants stress, further, that Pinard and Mills do not teach creating an up-to-date web page for the respective one of the plurality of categories of information from the search result wherein the up-to-date web page includes each respective link to each of the at least one searchable HTML documents containing the HTML keyword. Absent such teachings, the Pinard and Mills references cannot support the obviousness rejection.

For at least the reasons summarized hereinabove, Applicants respectfully submit that a *prima facie* case of obviousness has not been established. Accordingly, Applicants respectfully submit that independent Claim 8 and claims depending therefrom are clearly patentable over the cited references and respectfully request the Examiner to reconsider rejection of the claims.

**Claim 15 and the Claims Depending Therefrom.**

Claim 15 recites, *inter alia*, a method for maintaining a web site via searching.

The Examiner relied upon the Pinard reference to teach deciding on a plurality of categories of information to be displayed on a web site. Furthermore, the Examiner relied on the Pinard reference to teach creating at least one HTML document to be searched. However, Applicants have carefully reviewed the Pinard reference and respectfully submit that Pinard does not teach creating at least one HTML document to be searched.

The Examiner argued that Pinard teaches creating a hypertext reference. However, after carefully reviewing the Pinard reference, Applicants respectfully submit that Pinard discloses that HTML is a markup system used to create Hypertext documents that are portable from platform to platform. However, Applicants submit that the Pinard reference does not teach creating a hypertext reference.

In addition, the Examiner acknowledged that Pinard does not explicitly teach determining a plurality of searches, wherein each respective one of the plurality of searches corresponds to a respective one of the plurality of categories of information, each of the plurality of searches being executed by a search engine. The Examiner further admits that Pinard fails to teach assigning a keyword for each one of the plurality of categories of information, setting up a plurality of directories wherein each respective one of the plurality of directories corresponds to a respective one of the plurality of categories of information, each of the pluralities of directories for containing at least one searchable HTML document. Still further, Pinard admittedly does not teach the search engine using at least one of the plurality of searches and at least one assigned keyword, wherein the at least one assigned keyword is included in an HTML header of the at least one HTML document. Finally, the Examiner admits that Pinard fails to teach providing the search engine with the at least one of the plurality of searches including an assigned key work relating to a respective one of the plurality of categories of information, wherein the hypertext reference directs the search engine to search a respective directory relating to the respective one of the plurality of categories of information.

The Examiner argued that Mills teaches searching web page “based on the categories of information of item [sic] displayed on the screen from which the search engine would be search based on the keyword and the retrieved web page’s title or header including the keyword or search term in it.” The Examiner further argues that a plurality of directories to be created for web pages directories for web page and classification data or categories of information.

However, even if this were true (which Applicants do not admit), the Mills reference would not obviate the deficiencies of Pinard. The references simply do not teach, and the Examiner does not appear to argue that they teach all of the recitations of claim 15.

For at least the reasons summarized hereinabove, Applicants respectfully submit that a *prima facie* case of obviousness has not been established. Accordingly, Applicants respectfully submit that independent claim 15 and claims depending therefrom are clearly patentable over the cited references and respectfully request the Examiner to reconsider rejection of the claims.

**Claim 22.**

Claim 22 recites, *inter alia*, a method for adding an HTML document to a web site, the HTML document relating to a respective one of a plurality of categories of information.

The Examiner argued that Pinard teaches deciding on a plurality of categories of information to be displayed on a web site, creating at least one HTML document to be searched and creating a hypertext reference. Furthermore, the Examiner relied on the Pinard reference to teach automatically and dynamically creating a web page or HTML of an organization directory for use over the Internet network by using web page generator. The Examiner further argued that Pinard teaches that the web page is stored on the web

server allowing any user who has network access to the web server offering the web page to view the directory information and the web page or HTML is categorized by item, and creation of web page directory.

In addition, the Examiner acknowledged that Pinard does not explicitly teach determining a search corresponding to the categories of information, the search being executed by a search engine, or assigning a keyword for each one of the plurality of categories of information, or assigning a keyword for the category of information, or setting up a directory corresponding to the category of information, the directory for containing at least one searchable HTML document. The Examiner further admits that Pinard fails to teach the search engine using the search and the assigned keyword, wherein the at least one assigned keyword is included in an HTML header of the HTML document.

The Examiner argued that Mills teaches searching web page based on the categories of information of item displayed on the screen from which the search engine would be search based on the keyword and the retrieved web page's title or header including the keyword or search term in it, a plurality of directories to be created for web pages directories for web page and classification data or categories of information.

Here again, even if the Examiner's interpretation of the references were valid, the rejection is not *prima facie* complete on its face. The Examiner does not argue that the references teach or fairly suggest the recitations of the claim.

For at least these reasons, Applicants respectfully submit that a *prima facie* case of obviousness has not been established. Accordingly, Applicants respectfully submit that independent Claim 22 is clearly patentable over the cited references and respectfully request the Examiner to reconsider rejection of the claims.

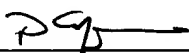


**Conclusion**

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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